

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing an Unified Intercarrier Compensation Regime)	CC Docket No. 01-92

**COMMENTS
of the
Ohio Telecom Association**

I. INTRODUCTION

In response to the FCC’s August 3, 2011, Public Notice initiating a “Further Inquiry into Certain Issue in the Universal Service-Intercarrier Compensation Transformation Proceeding,” the Ohio Telecom Association (OTA) files these initial comments on behalf of its members¹.

The OTA represents the interests of 43 companies, 41 Incumbent Local Exchange Carriers (ILECs) and two wireless companies. The large company members include AT&T Ohio, CenturyLink, Cincinnati Bell, Frontier Communications, Windstream Ohio

¹ Cincinnati Bell Telephone Company does not join with other OTA members in this filing.

and Windstream Western Reserve. There are 35 Rural ILEC members² whose access lines represent 2.4 percent of Ohio's more than 3,000,000 landline access lines. While classified as large companies in Ohio; three of our members, the legacy CenturyLink, Frontier Communications and the Windstream companies are considered mid-sized for purposes of this discussion. Our wireless members are AT&T and Verizon, who serve millions of Ohio customers.

OTA member companies serve all of Ohio's 49,948 square miles. The state has multiple metro areas, such as Akron, Cleveland, Columbus, Cincinnati, Dayton, Toledo, Youngstown and a population density of 281.7 persons per square mile, compared to the U.S. average of 87.3. We are fortunate to have a unique telecom industry in Ohio, with small, midsized and large companies serving our customers. This makes Ohio a perfect reflection of this national agreement.

This Consensus Framework, which is made up of two corresponding plans to support the deployment and continued operation of networks by these companies, has the support of the Ohio Telecom Association.

² Arcadia Telephone Company, Arthur Mutual Telephone Company, Ayersville Telephone Company, Bascom Mutual Telephone Company, Benton Ridge Telephone Company, Buckland Telephone Company, Champaign Telephone Company, Chillicothe Telephone Company, Columbus Grove Telephone Company, Conneaut Telephone Company, Continental Telephone Company, Doylestown Telephone Company, Farmers Mutual Telephone Company, Fort Jennings Telephone Company, Frontier Communications of Michigan, Inc., Germantown Independent Telephone Company, Glandorf Telephone Company, Kalida Telephone Company, Little Miami Communication Corp., McClure Telephone Company, Middle Point Home Telephone Company, Minford Telephone Company, New Knoxville Telephone Company, Nova Telephone Company, Oakwood Telephone Company, Orwell Telephone Company, Ottoville Mutual Telephone Company, Pattersonville Telephone Company, Ridgeville Telephone Company, Sherwood Mutual Telephone Association, Inc., Sycamore Telephone Company, Telephone Service Company, Vanlue Telephone Company, Vaughnsville Telephone Company and Wabash Mutual Telephone Company.

II. DISCUSSION

The Ohio Telecom Association finds that the framework for USF and ICC reform filed by the Rural Associations' Filing (RLEC Plan) for Rate-of-Return (RoR) carriers, and the America's Broadband Connectivity proposal (ABC Plan) for Price Cap Carriers on July 29, 2011, has accomplished a goal long sought by the industry.

- A. This Consensus Framework strikes a balance - some monetary assurances have been compromised in return for benefits borne of achieving this needed reform. This is absolutely necessary as companies work through a major transition process without damaging vital communication infrastructure or disrupting customer services.

The upside of the existing framework is that it continues to recognize the divergent needs of different types and sizes of companies with a reasonable assurance of cost recovery.

The Consensus Framework will benefit customers living in both rural and urban areas of Ohio, and afford investment recovery to those companies who have made significant investments in infrastructure including broadband deployment.

- B. The Consensus Framework brings policymakers and the industry as close as they have ever been to enacting real reform, restoring regulatory certainty, and enabling providers to focus on the delivery of high-quality services to consumers.

In this consensus plan, the large, small, mid-size, and rural carriers each compromised respective individual interests in order to obtain a more comprehensive industry proposal.

The success of carrying that commitment forward depends upon preserving the structure of the consensus.

The compromise of any party's rights by the FCC could unravel a landmark agreement and set back the chances that parties will undertake similarly difficult yet successful discussions in the future.

To break apart the Consensus Framework could well result in a judicial appeal if the outcomes failed to meet proper legal standards.

III. CONCLUSION

For all of the reasons enumerated above, the Ohio Telecom Association on behalf of its members in supporting the plan, request that the FCC act promptly, deal simultaneously with USF and intercarrier compensation reform, and keep the plans intact without further modifications.

Respectfully submitted,

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